

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

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FTX TRADING LTD. and MACLAURIN  
INVESTMENTS LTD.,

Plaintiffs,

- against -

LOREM IPSUM UG, PATRICK GRUHN,  
ROBIN MATZKE, and BRANDON WILLIAMS,

Defendants.

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Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Adv. Pro. No. 23-50437 (JTD)

**DECLARATION OF STEPHEN EHRENBURG IN SUPPORT OF PLAINTIFFS’  
OPPOSITION TO DEFENDANT BRANDON WILLIAMS’  
MOTION FOR A PROTECTIVE ORDER STAYING DISCOVERY**

I, Stephen Ehrenberg, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

1. I am a member of the Bar of the State of New York and a partner at the firm of Sullivan & Cromwell LLP, counsel to FTX Trading Ltd. and Maclaurin Investments Ltd. f/k/a Alameda Ventures Ltd. (the “Plaintiffs”). I am over the age of 21 years and am competent to testify of my own personal knowledge about the matters contained herein. As counsel to the Plaintiffs in the above-captioned adversary proceeding, I am fully familiar with the facts and circumstances recited herein, unless otherwise stated. I submit this declaration in support of *Plaintiffs’ Opposition to Brandon Williams’ Motion for a Protective Order Staying Discovery*, filed contemporaneously herewith.

2. Attached hereto as **Exhibit A** is a true and correct copy, to the best of my knowledge and belief, of an email chain between Plaintiffs’ counsel, Defendant Williams’ counsel, and Defendants Gruhn, Matzke, and Lorem Ipsum UG’s counsel, containing communications from July 23, 2023 through September 11, 2023.

3. Attached hereto as **Exhibit B** is a true and correct copy, to the best of my knowledge and belief, of a letter from Plaintiffs’ counsel to Defendants’ counsels, attaching a draft protective order, dated September 21, 2023.

4. Attached hereto as **Exhibit C** is a true and correct copy, to the best of my knowledge and belief, of an email chain between Plaintiffs’ counsel, Defendant Williams’ counsel, and Defendants Gruhn, Matzke, and Lorem Ipsum UG’s counsel, containing communications from November 2, 2023 through November 7, 2023.

I declare under penalty of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on November 14, 2023.

/s/ Stephen Ehrenberg

Stephen Ehrenberg

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